

DAVID J. HARRIS, ESQUIRE
ATTORNEY FOR DEBTORS
PA S. Ct. No.: 48558
FL Bar No.: 0451207

69 Public Square, Suite 700
Wilkes-Barre, PA 18701
Telephone: (570) 823-9400
Facsimile: (570) 208-1400
E-Mail: dh@lawofficeofdavidharris.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
JAMES J. HEFFERS, SR.	:	Chapter 13
D/B/A HEFFERS INSURANCE AGENCY	:	Case No.: 05:12-bk-06900
D/B/A JAMES J. HEFFERS INSURANCE	:	
AGENCY A/K/A	:	
JAMES J. HEFFERS	:	
	:	
Debtors	:	

JPMORGAN CHASE BANK, NATIONAL	:	
ASSOCIATION,	:	
	:	
Movant	:	11 U.S.C. §362
	:	
v.	:	
	:	
JAMES J. HEFFERS, SR.	:	
D/B/A HEFFERS INSURANCE AGENCY	:	
D/B/A JAMES J. HEFFERS INSURANCE	:	
AGENCY A/K/A	:	
JAMES J. HEFFERS	:	
MARY LOU HEFFERS	:	
Respondents	:	

**WITHDRAWAL WITHOUT PREJUDICE OF DEBTOR'S ANSWER TO MOTION OF
JPMORGAN
CHASE BANK, N.A. FOR RELIEF FROM THE AUTOMATIC STAY**

The Debtor, JAMES J. HEFFERS, SR., d/b/a HEFFERS INSURANCE AGENCY d/b/a JAMES J. HEFFERS INSURANCE AGENCY a/k/a JAMES J. HEFFERS, by and through his counsel, David J. Harris, Esquire, hereby withdraws the Debtor's Answer to the Motion of

JPMorgan Chase Bank, N.A. for Relief from the Automatic Stay without prejudice to any defense that may exist with respect to the claim of JPMorgan Chase Bank, N.A.

RESPECTFULLY SUBMITTED:

Dated: May 2, 2017
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris
DAVID J. HARRIS, ESQUIRE